
From: Poley, David/SCO
Sent: Wednesday, July 06, 2005 4:01 PM
To: Collar, Robert/SCO
Cc: Dolegowski, John/SCO
Subject: RE: Interim Draft 1,2,3-TCP Guidance Document for Area 3

Task breakdown for Lisa's responses are identified/color coded.

1. [Table of Contents] Please consider adding a table of contents. Unfortunately, the document has become long enough to warrant this in order to facilitate its use. You may find that, with a table of contents, the second paragraph in Section 1 (Introduction) is unnecessary. **Word Processing Task**

2. [Map] To help orient users, consider including a map of Area 3 depicting the currently identified areas of 1,2,3-TCP contamination. **Poley - discussed today with you and prior with Amanda.**

3. [Tables] Rather than sequentially numbering the tables, please renumber the tables so that they correspond to the various sections. For example, identify Tables 5, 6, 7, 8 as 5-1, 5-2 5-3, 5-4 instead. **Poley - done.**

4. [Section 1, Introduction, p. 1] Consider renaming this section "Purpose and Scope" or "Scope and Applicability" or some other equivalent title. **Poley - done.**

5. [Table 1, Uses of 1,2,3-TCP, pp. 2-3] Please consider indicating the time periods of 1,2,3-TCP use in this table if possible. **Dolegowski**

6. [Section 2, Identification of Potential Sources, p. 3] Please consider whether it would be possible to further narrow the list of businesses that likely may have historically used 1,2,3-TCP in Area 3. Alternatively, consider categorizing or grouping them by type of industry. This will make the information easier to digest. Also, please explain why it is unlikely (or less likely) that the contamination observed in Area 3 has resulted from agricultural uses of 1,2,3-TCP even though we know that, prior to development, this area was primarily agricultural. **Dolegowski**

7A. [Table 2, Summary of Investigation Tasks and Descriptions, pp. 4-5] This table includes a combination of instructions for users and supplemental information, and a mix of text written in an active voice and a passive voice. Consider instead using a consistent grammatical approach in describing tasks. (I prefer the active voice when providing instructions.) Also, consider restructuring all paragraphs to consistently provide instructions for users at the beginning of the paragraph, followed by supplemental information. For example, on page 4, second paragraph, under "Soil Gas Survey," start the paragraph by first directing users to evaluate facility or business operations so that they collect soil gas samples in areas where releases occurred, and then provide specific information obtained from "lessons learned" at the Burbank OU later in the paragraph. **Poley - done.**

7B. Eliminate the repetitive text from this table if possible. The text under "Determine Study Area" and "PRP Search and File Review"

appears to be identical on both pages 4 and 5. Is it necessary to include it on both pages? Also please delete the reference to EPA's PRP Search Contractor; simply indicate the work is completed by LARWQCB and EPA. **Word Processing Task (formatting error)**

7C. On page 4, second paragraph, under "Determine Study Area," please explain how the details provided on stratigraphy and groundwater flow direction might impact the investigation approach used. The implications of the subsurface features described (i.e., "... slope of the interbedded subsurface sedimentary strata ...") may be unclear to users (like me!) who are not geologists. Alternatively, describe the geology and its impact on contaminant fate and transport in general terms that can be more easily understood. **Poley - done.**

8. [Table 3, Comparison of Contaminants to Potential Businesses, p. 6] This table is great!

9. [Section 5, Analytical Methods, pp. 9-12] Please consider whether we should recommend any method specific or analyte specific quality control (QC) procedures that should be performed as part of the 1,2,3-TCP analyses, such as using performance evaluation (PE) samples. Carl Brickner may have comments about this. **Dolegowski**

10. [Table 9, Remediation Approaches for 1,2,3-TCP Contamination, pp. 13-14] Consider adding to this table any available information we have on the concentration ranges for which the listed remediation approaches are effective in treating 1,2,3-TCP. The efficacy of these techniques may be significantly limited at very low concentrations, such as the levels we've observed in SGV Area 3. Also, please consider whether it would be appropriate to include a note of caution to users regarding the potential limited applicability of these approaches to very low 1,2,3-TCP concentrations. **Dolegowski**

11. [Section 7, References, pp. 16-20] To make the reference section more user friendly, consider organizing the list of references by subject (e.g., sampling, analytical methods, remediation and treatment, chemical properties, uses and manufacturers, case studies, etc.). **Dolegowski/Poley**

12. [Appendix B, Uses and Manufacturers, p. B-1] Please indicate when the use of 1,2,3-TCP in aircraft fuel tank sealers began if we have this information. **Dolegowski**

13. [Table B-1, 1,2,3-TCP Manufacturing Information, pp. B-2 - B-3] Eliminate the repetitive text in this table if possible. The text under "Current U.S. Manufacturers" and "Bulk Uses/Origins" appears to be identical on both pages B-2 and B-3. **Word Processing Task (formatting error)**

14. [Burbank OU] Please clarify that the Burbank OU site repeatedly referenced throughout the document is actually part of the San Fernando Valley Superfund Site (Area 1 - North Hollywood and Burbank). **Poley - done.**

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Lisa Hanusiak  
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----- Forwarded by Lisa Hanusiak/R9/USEPA/US on 06/18/2005 11:43 AM

Robert.Collar@CH2 M.com	To: Lisa Hanusiak/R9/USEPA/US@EPA cc:
06/10/2005 07:32	Subject: FW: Interim Draft 1,2,3-TCP
Guidance Document	
PM	for Area 3

Hi Lisa,

If you can provide us with your comments via e-mail, as you did previously, that would be ideal. Please feel free to contact John Dolegowski by phone at 714-435-6355. John was the lead author of the interim draft guidance document. You may also e-mail comments to John and David (with a copy to me, please) at: jdolegow@ch2m.com and dpoley@ch2m.com.

Thanks and I'll look forward to catching up with you in a few weeks.

Bob

From: Collar, Robert/SCO
Sent: Friday, June 10, 2005 7:29 PM
To: Poley, David/SCO; Dolegowski, John/SCO
Cc: Antipas, Artemis/SEA
Subject: Interim Draft 1,2,3-TCP Guidance Document for Area 3

Hi David and John,

As a reminder, Lisa Hanusiak (contact information attached), our EPA Alhambra project client, will be reviewing the interim draft 1,2,3-TCP guidance document for Area 3 (attached) over the next week or so. And, I plan to ask her to provide comments to both of you. Note also that Artemis Antipas/SEA is checking on a few laboratory analytical method parts of the interim draft guidance document and that I've asked her to provide comments before I return from my vacation on July 5. Upon receipt of Lisa's and Artemis' comments, we can go ahead and revise the document accordingly, which would also involve including new Table A-3 in Appendix A (see my e-mail to you yesterday). My estimate is that we'll be in a position to finalize the revised document by the time I return. Once we've revised the interim draft document, I believe that Lisa will want to provide it to a couple of folks for review and to potentially begin utilizing it to support EPA's efforts to identify and investigate (through the LARWQCB) the source(s) of regional 1,2,3-TCP groundwater contamination in Area 3.

Please continue to charge your time to 175859.PP.04 for this effort.

Thanks,

Bob

----- Message from <Robert.Collar@CH2M.com> on Mon, 6 Jun 2005 21:42:52
-0600 -----

To: <hanusiak.lisa@epamail.epa.gov>

cc: <Arbaugh.Steve@epamail.epa.gov>, <ccharmley@waterboards.ca.gov>,
<John.Dolegowski@CH2M.com>

Subje Interim Draft Area 1,2,3-TCP Guidance Document
ct:

Hi Lisa,

Please find attached the subject document for your review. Please note that, with exception for a couple of things we discussed last week (format consistent with LARWQCB documents and detailed evaluation of investigation, sampling, and analysis at U.S. sites with 1,2,3-TCP contamination), the attached document reflects revisions to the previous version in response to your comments provided to us on May 2, 2005.

Please note that there is one table that remains to be added to Appendix A (Table A-3, a comparison of 1,2,3-TCP properties with PCE, TCE, and 1,4-dioxane). Our main goal in providing you with this version now is to get your concurrence on the overall content, format, and usefulness of the document. Upon your concurrence, we'll provide a revised version of this document to EPA and the LARWQCB for immediate use on the Area 3 project.

Let's try to discuss this document briefly before I depart for my vacation, with the hope of revising and finalizing it during my absence.

Thanks,

Bob
Robert J. Collar
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3 Hutton Centre Drive, Suite 200
Santa Ana, CA 92707
714-435-6274 (direct phone)
714-424-2078 (direct fax)
rcollar@ch2m.com (e-mail) (See attached file: Interim Draft Area 3
123-TCP Guidance_rev0.PDF)
----- Message from <Robert.Collar@CH2M.com> on Fri, 30 Aug 2002 10:18:54
-0600 -----

Subject: Lisa Hanusiak

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